

# **Exhibit N1**

**UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_  
EASTERN PROFIT CORPORATION  
LIMITED

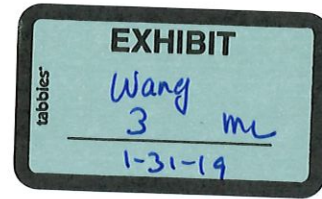
Plaintiff,

v.

STRATEGIC VISION US, LLC  
\_\_\_\_\_

Defendant.

Case No. 18-CV-2185 (JGK)



**PLAINTIFF EASTERN PROFIT CORPORATION LIMITED'S REPONSES  
AND OBJECTIONS TO DEFENDANT STRATEGIC VISION US, LLC'S FIRST  
SET OF INTERROGATORIES**

Eastern Profit Corporation Limited ("Eastern") by its attorneys, Zeichner Ellman & Krause, LLP, responds as follows to Strategic Vision US, LLC's ("SV") First Set of Interrogatories to Eastern, dated November 13, 2018 (the "Interrogatories").

**OBJECTIONS TO SV'S INSTRUCTIONS**

A. Eastern objects to SV's Instructions to the extent that they seek to impose obligations beyond those imposed by the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York.

**SPECIFIC RESPONSES TO SV'S FIRST SET OF INTERROGATORIES**

1. Identify all persons with whom Eastern consulted when answering these Interrogatories, or who were otherwise involved in any way in answering these Interrogatories.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, Yvette Wang and Guo Wengui were consulted when answering these Interrogatories.

2. Identify the principals of Eastern.

**Response:** Chunguang Han is the principal of Eastern.

3. Identify the principals of ACA Capital Group Limited.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory because it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation.

4. Identify who directed the wires on or about December 29, 2017 in the total amount of \$1 million be sent to Strategic Vision.

**Response:** Eastern objects to this interrogatory because the term "directed" is vague, ambiguous and unclear in this context. Notwithstanding the forgoing objection, Guo Wengui, on behalf of Eastern, ordered wires totaling \$1 million to be sent to Strategic Vision on or about December 29, 2017.

5. Identify each person with knowledge of the Agreement, including the negotiation of same.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, Guo Wengui, and Gare Smith have knowledge of the Agreement, including the negotiation of same.

6. Identify each person who participated in the "meetings between representatives of Eastern and Strategic Vision," as alleged in paragraph 8 of the Complaint.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, William Gertz, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, and Guo Wengui participated in one or more meetings between representatives of Eastern and Strategic Vision.

7. Identify each person with knowledge of Strategic Vision's misrepresentations of its "capabilities, resources, expertise and prior experiences," as alleged in paragraph 16.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Eastern further objects to this

interrogatory, because it is ambiguous and vague due the fact that it does not identify which document's paragraph 16 is being referenced.

8. Identify each person with knowledge of Strategic Vision's failure to deliver its initial set of weekly reports on time, as alleged in paragraph 18 of the Complaint.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, and Guo Wengui have knowledge of Strategic Vision's failure to deliver its initial set of weekly reports on time.

9. Identify each person with knowledge of the first delivery under the Agreement, including all reports and raw research materials, as alleged in paragraph 20 of the Complaint.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, and Guo Wengui have knowledge of the first delivery of information Strategic Vision made on or about January 30, 2018.

10. Identify each person with knowledge of the information provided by Eastern to Strategic Vision under the Agreement, including the flash drives delivered to Strategic Vision.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, and Guo Wengui have knowledge of the information provided by Eastern to Strategic Vision under the Agreement, including the flash drives delivered to Strategic Vision.

11. Identify each person with knowledge of Strategic Vision's failure to deliver reports and meet the schedule under the Agreement, as alleged in paragraph 23 of the Complaint.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, and Guo Wengui have knowledge of Strategic Vision's failure to deliver reports and meet the schedule under the Agreement.

12. Identify each person with knowledge of Eastern's demand for return of the \$1 million deposit, as alleged in paragraph 24 of the Complaint.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information

relevant to the subject matter of this litigation. Subject to Eastern's objection, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, Guo Wengui, Gare Smith, and Anthony D. Mirenda, and Peter Sullivan, have knowledge of Eastern's demand for return of the \$1 million deposit.

13. Identify each person with knowledge of Eastern and/or ACA Capital Group Limited's attempt to reverse the wires of the \$1 million deposit, or otherwise have the payment returned by non-voluntarily means.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, Yvette Wang and Guo Wengui have knowledge of attempts to reverse the wires of the \$1 million deposit.

14. Identify each person on the initial list of 15 subjects contained on the flash drive delivered by Ms. Y to Strategic Vision, as alleged in paragraph 63 of the Answer.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory because it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation.

15. Identify each person with whom you have consulted as an expert or whom you expect to call as an expert witness at the trial of this action. For each such person, identify:

- a. the person's name, address, and telephone number;
- b. an explanation of the subject matter on which the person is expected to testify;
- c. the substance of the facts and opinions, as well as the basis for each opinion, to which each person is expected to testify;
- d. the educational background, training, and experience that you contend qualifies each person as an expert; and
- e. each person's field(s) of expertise.

**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory because it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Eastern further objects to this interrogatory because it is premature.

16. Provide an itemized statement of your alleged damages.

**Response:** Eastern's damages in this case are as follows:

\$1,000,000 for the \$1,000,000 paid to Strategic Vision as a deposit under the Agreement, plus reasonable attorneys' fees which shall be determined at the time of trial, the costs associated with this action, pre-judgement interest at the legal rate of interest.

17. Identify the name and address of each person that you know or claim has knowledge of the allegations in the Complaint, including the damages alleged in the Complaint.



**Response:** Pursuant to Local Rule 33.3, Eastern objects to this interrogatory to the extent it seeks information beyond the identification of witnesses with knowledge of information relevant to the subject matter of this litigation. Subject to Eastern's objection, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, Guo Wengui, Gare Smith, Peter Sullivan, and Anthony D. Mirenda have knowledge of the allegations in the Complaint.

18. Identify all documents, witnesses, evidence, materials and testimony not previously identified in your answers to these interrogatories, and upon which the allegations in the Complaint are based, or upon which you relied in preparing the answers to these interrogatories, or will rely in proving your contentions or in responding to any of Strategic Vision's counterclaims, allegations, denials and defenses at the trial of this action.

**Response:** Eastern objects to this interrogatory because (1) it calls for the disclosure of documents and information not permitted by Local Rule 33.3, (2) it is compound, vague and unintelligibly muddled, (3) is an impractical and unduly burdensome means of obtaining the information sought, and (4) calls for the disclosure of trial witnesses and evidence prematurely under the Federal Rules of Civil Procedure. Subject to Eastern's objections, William Gertz, French Wallop, J. Michael Waller, Yvette Wang, Lianchao Han, Guo Wengui, Gare Smith, Peter Sullivan and Anthony D. Mirenda have knowledge of the subject matter of this action.

**AS TO THE OBJECTIONS:**

Dated: New York, New York  
December 20, 2018

**ZEICHNER ELLMAN & KRAUSE LLP**

By:           /s/                                  
Zachary B. Grendi, Esq.  
*Attorneys for Plaintiff*  
1211 Avenue of the Americas  
New York, New York 10036  
(212) 223-0400  
zgrendi@zeklaw.com

**VERIFICATION**

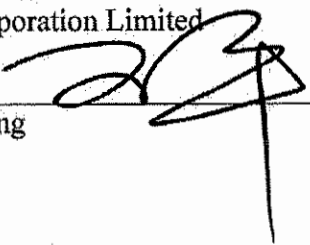
I, Yvette Wang, state that I have read the foregoing responses; that the responses were prepared with the assistance of counsel; that the responses are, subject to inadvertent and undiscovered errors, based on and therefore necessarily limited by the records and information I have reviewed, or by my personal knowledge of certain facts were so stated, and by information thus far discovered in preparing these responses.

I reserve the right to make any changes in the responses if it appears at any time that material omissions or errors have been made therein or that more accurate information is available.

Subject to these limitations, I state, under the pains and penalties of perjury, that the responses are true to the best of my knowledge, information and belief.

Date Executed: 12/20/2018

Golden Spring (New York) Ltd.  
As attorney in fact for  
Eastern Profit Corporation Limited

Signature: 

Name: Yvette Wang

Title: President

Sworn to before me this  
20 day of December 2018

  
Notary Public

**KARIN MAISTRELLO**  
NOTARY PUBLIC STATE OF NEW YORK  
Registration No. 01MA6376654  
Qualified in NY County  
Commission expires June, 18 2022

**CERTIFICATE OF SERVICE**

I, the undersigned, of the law offices of Zeichner Ellman & Krause LLP, attorneys for Eastern Profit Corporation Limited, do hereby certify that that I have served all parties of record with copies of the below listed documents by U.S. Mail on this December 31, 2018:

Documents:

- Eastern Profit Corporation Limited's Responses and Objections to Strategic Vision US, LLC's First Set of Interrogatories

/s/  
Zachary Grendi